IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA,)))
vs.) Case No. 1:10-cr-00485-LMB
JEFFREY ALEXANDER STERLING,)
Defendant.)))

DEFENDANTS PROPOSED VOIR DIRE

COMES NOW Jeffrey A. Sterling, by counsel, and submits the following proposed voir dire questions. The defense requests that the Court ask the jury panel the following questions in addition to the standard questions that the Court intends to ask:

- 1. Do you know or are you related to W. Patrick Lang?
- 2. Do you know or are you related to David Manners?
- 3. Do you or are you related to Jeffrey Sterling or his wife Holly?
- 4. Do you work or have you ever worked at the Central Intelligence Agency or the Defense Intelligence Agency?
- 5. Do you have any strong opinions about the CIA, positive or negative? Would you give the testimony of a CIA employee or former CIA employee any more weight or any less weight than that of any other witness?
- 6. Do you have any opinions regarding whether or not CIA employees keep information confidential?
- 7. Do you or a close relative or friend currently work for, on in the past worked for, the United States Senate Select Committee on Intelligence?

- 8. Do you have an opinion whether members of the staff of the United States Senate keep information confidential?
- 9. Are you serving or have you served in the United States military?
- 10. Are you familiar in any way with the design of nuclear weapons?
- 11. Do you have any knowledge or opinion as to the state of the Iranian Nuclear Weapons program from 2000 to the present? If so, what is that knowledge or opinion?
- 12. Do you know any knowledge or opinion as to how reporters in Washington, D.C. obtain information to write stories about the CIA or its agents?
- 13. Have you read any of Mr. Risen's books including State of War?
- 14. Do you have an opinion about Mr. Risen or the New York Times or Simon & Schuster?
- 15. Have you ever worked as an intelligence analyst?
- 16. Do you have any opinion as to whether Iran should be allowed to obtain nuclear weapons?
- 17. Have you ever filed an employment related suit against any of your former employers? Do you have any strong opinions about such suits or people who file such suits?
- 18. Do you believe that government officials or former government officials should be able to share information with journalists even if it is classified?
- 19. Do you believe that leaks of classified information compromise national security?
- 20. Do you believe that a former government official who provides classified information to a reporter should be prosecuted for espionage?
- 21. Do you believe that a former government official who provides classified information to a reporter should be prosecuted for espionage even if the Government brings no charges against the reporter or his or her publisher?
- 22. Do you have any opinions about the CIA or other intelligence agencies using paying people who are not employees of the CIA to act as agents or "human assets" to secretly gather information about foreign countries?

- 23. Do you believe that people who act as agents or "human assets" for the CIA or other intelligence agencies keep information confidential?
- 24. Do you have any strong opinions about Condoleeza Rice?
- 25. Would you give her testimony and more weight or less weight than that of any other witness?
- 26. Certain witnesses in this trial may testify from behind a screen to protect their identity. Would this impact your evaluation of their testimony? Would you give that witness' their testimony any more weight or any less weight than that of any other witness? Would you draw any inferences from the fact that the witness is testifying about the screen as to whether or not the identity of the witness or the subject matter of the witness' testimony relates to national defense information or affects national security?
- 27. The CIA engages in secret operations in which it tries to feed disinformation to other countries. Do you have any strong opinions about such programs?

JEFFREY A. STERLING By Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of October 2011, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

By: /s/
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